

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

FEDERATED MUTUAL INSURANCE
COMPANY,

Plaintiff,

v.

ASSUREDPARTNERS OF ILLINOIS, LLC,
and THOMAS BALOGH,

Defendants.

Case No. 1:24-CV-05480

**UNOPPOSED MOTION FOR EXTENSION OF TIME FOR DEFENDANTS TO
ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendants AssuredPartners of Illinois, LLC and Thomas Balogh (collectively “Defendants”), by and through their undersigned counsel, and with consent of counsel for Federated Mutual Insurance Company (“Plaintiff”), respectfully ask this Court to grant an extension of time up to and including, August 21, 2024, to respond or otherwise plead to Plaintiff’s Complaint. *See* ECF No. 1. In support thereof, Defendants state as follows:

1. On June 28, 2024, Plaintiff filed its Complaint. *See* ECF No. 1.
2. On July 10, 2024, Defendants were served with a copy of Plaintiff’s Complaint, with an answer deadline of July 31, 2024.
3. On August 5, 2024, Defendants recently retained their undersigned counsel to represent them in this matter, and as such, counsel has not had an adequate opportunity to review the file, investigate the allegations, and respond to the pleading.
4. Defendants do not file this unopposed motion for purposes of delay, but rather in a good faith effort to fully analyze and respond to the claims and allegations made by Plaintiff.

5. Defendants have not requested any prior extensions.

6. Counsel for Defendants has conferred with Plaintiff's counsel, who does not oppose this request.

7. Accordingly, Defendants request an extension of time up to and including, August 21, 2024, to respond or otherwise plead to Plaintiff's Complaint.

WHEREFORE, Defendants AssuredPartners of Illinois, LLC and Thomas Balogh respectfully request that this Court grant this unopposed motion for extension of time to file their responsive pleading to Plaintiff's Complaint.

Dated: August 5, 2024

Respectfully submitted,

By: /s/ Arielle B. McPherson
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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 5th day of August, 2024, a true and accurate copy of the foregoing was filed electronically with the Clerk of the Court to be served upon all counsel of record via the Court's CM/ECF Filing System.

/s/ Arielle B. McPherson